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USDS SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 8/27/08	NEW JERSEY OFFICE 1118 CLIFTON AVENUE CLIFTON, NJ 07013 TEL: (973) 779-1116 FAX: (973) 779-0739 HARRY A. GAVALAS (1978-1999) ROBERT J. SEMINARA (1987-1999)
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MEMO ENDORSED

August 26, 2008

BY FACSIMILE
(212) 805-7949

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
Daniel P. Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: CNAN Group Spa v. American Steamship Owners Mutual P&I Assoc., Inc.
08 Civ. 5394 (PKC)
Our File No.: 1545.0006

Dear Judge Castel:

We represent the defendant in this matter and write to respectfully request a postponement of the initial status conference currently scheduled for September 5, 2008. This is the first request for a postponement, and is made with the consent of plaintiff's counsel.

By way of background, plaintiff is an Algerian company involved in the business of vessel operation and management. Defendant is a protection and indemnity insurance association based in New York, which provides insurance coverage for shipping interests worldwide. The present action involves a dispute over reimbursement for numerous claims allegedly settled by plaintiff over a two year period.

This action was commenced on June 13, 2008. Currently, the parties are coordinating meetings with individuals in London, New York, and Algerian offices to discuss the possibility of settlement and to narrow the points of disagreement. However, the difficulties of coordinating meetings across different time zones and continents have necessarily resulted in some delays, and the parties require additional time to continue exploring these issues. Accordingly, the parties respectfully request an additional sixty days for the initial status conference—until November 4, 2008—to continue these discussions.

Conference postponed from September 5 to 9:30am November 7, 2008 at 9:30am
SD ORDERED
USDS
8-26-08

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We thank the Court in advance for its consideration of this request.

Respectfully submitted,

BROWN GAVALAS & FROMM LLP



Peter Skoufales

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